UNITED STATES OF AMERICA BEFORE THE LABOR RELATIONS BOARD

STARRS GROUP HOME)	٠,			•		٠.	*,		
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RAYMOND A BARNS)			¥ .	:		. ,	· · ·	.•
•)		Case No.: 5-CA-36537						

ANSWER WITH CAUSE TO NOTICE OF TRANSFER TO THE BOARD MOTION TO DEFER DEFAULT REQUEST FOR POSTPONMENT

RIDDICK PARKER, Program Administrator, of STARRS Group Hone, Inc. on behalf of STARRS Group Home, Inc., files an Answer to the Show Cause Notice of Transfer of the instant action to the Board and Motion to Defer Default and Requests a Postponement of the scheduled trial date and in support of these requests states:

- 1. That as the Executive Director, not licensed to practice law in any state in the United States, he was not aware of the procedural requirements for responding to a Complaint filed before the Labor Relations Board.
- 2. That he was not aware that he was required to file and an Answer to the Complaint in addition to the statement given to the Board investigator.
- 3. That after conferring with an attorney regarding the nature of these proceedings, he learned for the first time that this matter is of an adversarial nature and in a contested posture.
- 4. That after understanding this process, the Executive Director is in the process of retaining an attorney to represent the noted Employer with its defense of this matter.

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- That the Executive Director requires approval from the Employers' Bound of Directors
 and the Director's are not scheduled to meet until September.
- 6. Then after an attorney is remined that attorney will require time to become familiar and prepared to defend the Employer's position in this matter.
- That the Employer has a merinorious defence in this matter and wishes to file a formal.
 Answer to the Complaint.
- That deferral of the Request for Default and/or postprinement of this matter will not unduly projudice the Complainant's case.

FOR THESE REASONS, STARRS Group Home, Inc. is requesting the Board to

- A. Defer Transfer of the instant action to Board:
- B. Defer Notice of Default for failure to file a timely Answer to the Complaint;
- C. Cirent time to the Employer to file a formal response to these proceedings.
- 1). Grant a postponement to the pending hearing; and
- E. Grant any other appropriate relief that the nature of this cause would require.

Respectfully Submitted and deted at Baltimore, Mary land on the 25th day of August 2011

Ruddick Parker

Program Administrator

STARRS Group Home, Inc.

3904 Maine Street

Baltimore, Maryland 21207

ORDER SECTION
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